

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 20-mj-401 HB

UNITED STATES OF AMERICA,

Plaintiff,

v.

**FILED UNDER SEAL  
PURSUANT TO ORDER**

DYLAN SHAKESPEARE ROBINSON,

**MOTION TO SEAL**

Defendant.

The United States of America, by its attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and Harry M. Jacobs and David P. Steinkamp, Assistant United States Attorney, respectfully submits this motion to file the Complaint and accompanying Affidavit of Special Agent Nathan R. Boyer under seal.

The United States seeks to seal the Complaint and Affidavit because the defendant, Dylan Shakespeare Robinson, is not yet in federal custody. Law enforcement officers investigating this case have expressed serious concern that if the Complaint and Affidavit are made public, and Dylan Shakespeare Robinson is alerted of his impending arrest on the federal warrant, there is a safety risk to Dylan Shakespeare Robinson and law enforcement taking him into federal custody.

Dated: June 13, 2020

Respectfully submitted,

ERICA H. MACDONALD  
United States Attorney

BY: s/ Harry M. Jacobs  
HARRY M. JACOBS  
DAVID P. STEINKAMP  
Assistant U.S. Attorneys